UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

CREIGHTON TAKATA, individually and on behalf of all others similarly situated,

Plaintiff,

v.

RIOT BLOCKCHAIN, INC. f/k/a BIOPTIX, INC., JOHN O'ROURKE, JEFFREY MCGONEGAL, BARRY HONIG, CATHERINE DEFRANCESCO, MICHAEL BEEGHLEY, JOHN STETSON, MARK GROUSSMAN, ANDREW KAPLAN, MIKE DAI, JASON LES, and ERIC SO,

Defendants.

Case No. 3:18-02293 (FLW) (TJB)

MOTION FOR LEAVE TO WITHDRAW AS COUNSEL

Pursuant to Local Civil Rule 102.1, Defendant Catherine DeFrancesco, by and through her counsel at Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), respectfully moves for the withdrawal of Alexander P. Wentworth-Ping as counsel *pro hac vice* to Ms. DeFrancesco in the above-captioned action.

As of May 29, 2020, Mr. Wentworth-Ping will no longer be associated with Quinn Emanuel. Other attorneys at Quinn Emanuel, including Jaclyn Palmerson as local New Jersey counsel, will continue to serve as counsel of record following Mr. Wentworth-Ping's withdrawal. Mr. Wentworth-Ping's withdrawal will not affect the posture of this action.

Undersigned counsel has conferred with counsel for Plaintiff, who consents to this motion.

WHEREFORE, Ms. DeFrancesco respectfully requests that this Court grant the Motion to Withdraw and enter the proposed Order on Consent Granting the Motion to Withdraw.

DATED: New York, New York

May 22, 2020

Respectfully submitted,

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By: /s/ Jaclyn M. Palmerson

Jaclyn M. Palmerson (N.J. Bar. No. 209452016)

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